

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE: ARC AIRBAG INFLATORS
PRODUCTS LIABILITY LITIGATION

MDL No. 3051
Case No. 1:22-md-3051-ELR

Hon. Eleanor L. Ross

**HYUNDAI MOTOR COMPANY
AND KIA CORPORATION'S
MOTION TO DISMISS
CONSOLIDATED CLASS
ACTION COMPLAINT**

Defendants Hyundai Motor Company and Kia Corporation move to dismiss Plaintiffs' Corrected Consolidated Class Action Complaint. This motion is based on the concurrently filed Memorandum of Points and Authorities, Defendants' Joint Notice of Motion and Motion to Dismiss and attached exhibits, Hyundai Motor America and Kia America, Inc.'s Notice of Motion and Motion to Dismiss and attached exhibits, reply briefs to each motion and attached exhibits, any further briefing or exhibits in support of the motions, and the arguments of counsel. Dkts. 180, 181, 189, 242, 249.

Defendants Hyundai Motor Company and Kia Corporation respectfully request that the Court grant the motion and enter an order dismissing all claims against them with prejudice.

Dated: September 16, 2024

Respectfully submitted,

/s/ Eric S. Mattson

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CERTIFICATE OF SERVICE

I certify that on September 16, 2024, a copy of the foregoing Hyundai Motor Company and Kia Corporation's Motion to Dismiss Consolidated Class Action Complaint was served electronically through the Court's electronic filing system on all parties appearing on the Court's ECF service list.

/s/ Eric S. Mattson